**2021-22 Education Funding Guide Response to the Ministry
- Draft Response**

Introduction

The Toronto District School Board (TDSB) is Canada's largest and most diverse school board, with approximately 245,000 students at 582 schools, including nearly 80,000 students attending the TDSB Virtual School, which opened in September 2020 in response to the COVID-19 pandemic. We also serve more than 140,000 life-long learners in our Adult and Continuing Education programs.

As the largest and most diverse school board in the country, we have unique needs when it comes to what is required to best support our students and communities. Our students need safe and modern learning environments, appropriate special education supports, targeted supports for mental health and well-being and access to reliable and up-to-date technology. And, especially during these unprecedented times, it is even more critical for school boards to receive adequate financial support to help address the widening gaps in student achievement and learning loss resulting from the COVID-19 pandemic.

In addition to answering the Ministry's questions, we would also like to further highlight the following priority areas for the TDSB:

1. Capital Needs
2. Education Development Charges
3. Special Education and Mental Health Support
4. Technology
5. Pandemic Impacts

1) Capital Needs

The TDSB is the largest school board in the province with hundreds of aging building infrastructures, with an average age of 64 years. However, over the past two years, the TDSB has only been approved for three out of the 10 Capital Priorities projects submitted for approval consideration. TDSB would like to request that the Ministry

consider the size of the school board when determining the number of submissions to be considered.

We also request that the Ministry expedite the capital construction's Approval to Proceed (ATP) process. Faster timelines will avoid significant cost increases due to timing between submission and approval, and minimize accommodation pressures due to project delays.

The province has provided multiple years of additional School Condition Index (SCI) funding for school repairs which has allowed the TDSB to address the growing facilities renewal needs in our schools. The additional funding however, has not been enough to decrease the significant $3.5 billion backlog in TDSB's repairs. One solution that would assist the TDSB in managing the renewal backlog would be the elimination of the school closure moratorium, which would allow the TDSB to address over capacity and program issues, reduce renewal needs and lower operating costs. It is also imperative that the province commit to providing predictable and sustainable funding for school repairs to a level that will allow for the TDSB to continue to implement its long-term plan for renewal, reduce the repair backlog, and modernize our schools as 21st century learning environments.

As an urban board, the TDSB continues to face unique challenges relating to the capital program, including higher construction costs in Toronto compared to other rural school board jurisdictions. This is a result of constricted site access, building code requirements and price inflations in the high-density urban construction market. TDSB would ask that the Ministry update construction benchmarks to take into account urban building costs.

2) Education Development Charges

In Ontario, school boards, with the exception of the TDSB, are eligible for Education Development Charges (EDCs), a significant source of revenue. The TDSB does not qualify because it has excess capacity when assessed on a district-wide basis, regardless of significant capacity pressures and challenges faced in many neighborhood schools. This puts the TDSB at a disadvantage.

Education Development Charges (EDCs) are a critical funding tool that would help the TDSB meet growth-related infrastructure needs. While there are pockets of space within

our system, many of our schools are over capacity as a result of significant residential intensification in certain areas. Lack of sufficient space in local schools in some areas of the City has forced the TDSB to adopt different accommodation strategies for managing enrollment growth including redirecting students from new residential developments to other TDSB schools located outside the area, using portables and changing program and school boundaries. In our view, the same way that developers pay for services such as roads, transit, water, sewer infrastructure and community centres, they should also contribute to education. TDSB continues to be at a disadvantage due to its inability to collect EDCs from developers which could generate approximately $500M in additional revenue for the Board over the next 15 years.

We continue to advocate that the government modify or remove the restrictions in Section 10 of Ontario Regulation 20/98 to allow all school boards to qualify for EDCs and be able to use those funds for expansion of existing schools or building new schools.

3) Special Education and Mental Health Support

The TDSB has consistently spent more than the government funding provided for Special Education. Last year, the TDSB spent $47.4M more on Special Education than we were funded for by the province. Additionally, the number of students requiring Special Education support increases each year, putting even more financial pressure on school boards to support students' unique and complex needs.

To ensure that all of our students receive the support they need, we urge the province to reconsider the Special Education funding model and make the appropriate enhancements to meet the financial needs of school boards and the educational needs of the students of Ontario. This is becoming even more essential as the demand for special education continues to grow.

Additional financial resources to support students' mental health and well-being, and help students cope with issues such as stress, anxiety and depression, are also critical and needed. Mental health and well-being is essential to student success. We know that one in five Ontario students has a mental health problem and we also know that schools can promote positive mental health, identify and intervene early to prevent the onset of problems and respond to children and youth in distress.

Additional resources will be needed next year to support all students as they cope with the unprecedented physical, social and emotional impact of the pandemic and return to the post-pandemic school environment.

4) Technology

The continuation of funding for technology is vital to allow school boards to provide collaborative and communication platforms as well as digital devices, tools and resources for students and staff. Investments in hardware and services are also required to close the digital divide between students who have access to devices, internet connectivity, digital resources and tools and those who do not.

This need for technology -- hardware, software and digital resources -- within the TDSB has been accentuated by the COVID-19 pandemic.

Our Board's goal is to achieve a one device per student (1:1) ratio and to continue to develop our library of digital content resources and program materials to support our 21st century learners in all environments.

To build a sustainable digital and virtual learning ecosystem, additional investments in technology are needed to ensure an equitable learning environment for students.

5) Pandemic Impacts

The health and safety of staff and students has been a priority to the Toronto District School Board throughout the COVID-19 pandemic. Over the past 10 months, the TDSB provided students with regular and meaningful learning opportunities while maintaining a safe environment for our entire school community.

Responding to the pandemic included a significant and urgent shift to remote learning in the spring, including ensuring access to technology for approximately 245,000 learners as well as opening two Virtual Schools for nearly 80,000 of these learners in September 2020. We know there is a disproportionate number of students of families with lower socio-economic status enrolled in the Virtual Schools and many families do not have adequate financial means to provide technology devices or broadband internet access to support their children's participation in remote learning. The TDSB has already supported students with more than 70,000 devices and helped families with internet connectivity and purchasing digital resources to accommodate these growing demands.

In addition, we recognize the tremendous emotional, social and physical strains of the pandemic on students and must continue to provide additional resources and supports to help students during this time.

The Board is concerned about the learning gaps created by the pandemic on students. To minimize this impact, additional resources will be needed, including additional teachers, professional support services and professional development.

At this point, it is unclear what impact the pandemic will continue to have, however, we can anticipate the following needs:

- Additional support learners to help address achievement gaps and learning loss as a result of the pandemic.
- Mental health supports to help students' address the physical, social and emotional impact of the pandemic.
- Additional staffing to help ease the transition for students returning to in-person learning, in some cases, after more than a year out of school.
- Continued financial support of IT infrastructure to support students during the pandemic and beyond, to support learning in the 21st century.
- Funding support to acquire virtual curriculum materials to support student learning in both the classroom and library.
- Funding to invest in research to help gather and analyze data to further identify those gaps and develop related action plans to provide targeted support for students.

TDSB's Response to the Education Funding Guide Questions

COVID-19 OUTBREAK RESPONSE

1. How do we ensure that the GSN remains agile to continue to respond to the COVID-19 outbreak?

It is recommended that the government provides full funding of pandemic-related costs to ensure a safe return to classrooms and to support the well-being of both staff and students. School boards could benefit from additional in-year funding in 2021-22, as well as increased flexibility in the use of the funding to help address evolving operational needs.

We are also seeking the Ministry's direction on recommended program delivery options corresponding to the next GSN announcement so that school boards can adequately plan and forecast costs.

Ongoing communication between the Ministry and school board officials, educators and support staff will ensure effective understanding and awareness of program needs and to address any gaps in funding.

2. What is required to successfully help students post COVID-19?

It is recommended that the government provides additional resources to school boards to address the widening gaps in student achievement and learning loss as a direct result of the COVID-19 pandemic. We would also like to advocate for funding to invest in research to help gather and analyze data to further identify those gaps and develop related action plans to provide targeted support for students.

There is also an increased need for additional mental health supports for both students and staff to help address the physical and emotional impact of the pandemic.

It is anticipated that remote learning will continue in some form post COVID-19, and therefore it is important that all students have equitable and continued access to technology and learning resources.

ONLINE LEARNING ADJUSTMENT

1. As future adjustments to the funding methodology for online learning courses are to be confirmed through the 2021-22 FSB, do changes and/or adjustments need to be made to the Online Learning Adjustment in order to be more responsive?

Below are some general considerations relating to online learning:

- Students in online learning may be at a disadvantage compared to in-person learning, due to higher class sizes.
- Adjustments should be considered for the number of students who are formally identified by IPRC or have IEPs so that teachers can best address the needs of students effectively.
- Ongoing technology training for teachers and students is necessary.
- There should be equity of access to technological devices for students.
- Technology Enabled Learning Teacher (TELT) funding needs to reflect the needs of TDSB's student enrolment. Currently, every Board receives the same funding regardless of Board enrollment.
- There needs to be adequate staff training to meet the needs of English Language Learners (ELL) and French students.
- Clarification is required on whether the two "online courses" will be selected from a menu of courses, or mandated by the school, school board or Ministry.
- The Online Learning Adjustment should consider future changes relating to the Continuing Education credit courses.

With all of these considerations in mind, the TDSB is concerned about the impact this change will have on our delivery model and would like to seek further consultation with the Ministry to ensure that students' programs are not adversely affected as a result of funding changes.

PRIORITIES AND PARTNERSHIP FUND

1. Are there further opportunities to improve the administration of transfer payment agreements to continue supporting a reduction in administrative burden?

The consolidation of the transfer payment agreement would not save the Board a lot of administrative time. Some additional rationale and recommendations are provided below:

The most time consuming part of the PPF process is the financial reporting review and approval processes and not the administration of the transfer payment agreements.

The transfer payment agreements (TPA) would contain multiple different grants with different expiry dates and reporting deadlines, which may create confusion when sent to separate departments with oversight of individual grants.

One suggestion to reduce the reporting requirement for some of the grants and to help reduce the administrative time, would be for the Ministry to develop a central electronic reporting portal (similar to the PRISA platform) for tracking of all or the majority of PPFs to be used by both the Ministry and the Board. This change would help reduce administrative time for both organizations. Notifications could be communicated through the portal as well to allow for the use of a central repository of all information. TPA and reports could be uploaded, stored and downloaded from the portal and accessible to individuals with authorization of access to the grants.

The Ministry may also consider aligning the PPF reporting deadlines to the Board's Ministry financial reporting timeframes to streamline the financial reporting involved.

2. Are there other PPF initiatives that should be transferred to the GSN?

We suggest the following Program Priorities Funding (PPF) initiatives to be reconsidered to the GSN:

- SHSM (Specialist High Skills Major) – currently, half of the grant is part of GSN. It would be more efficient to have both parts of the grant in GSN for planning and reporting purposes.

- FSL (French as secondary language initiatives) to be part of the FSL grant as a table amount.
- The Parents Reaching Out grant and another grant in the GSN called the Parent Engagement grant are similar in nature. There could be consideration to consolidate these grants.
- Human Rights and Equity Advisor grant – this grant could be consolidated with the Administrative grant in the GSN.

3. What potential areas of overlap exist within currently funded programs? What opportunities might there be to streamline funding, and to streamline reporting?

Boards require more flexibility to address evolving needs. Combining some of the PPFs or consolidating with the GSN would allow for greater ease of tracking and create operational efficiencies.

The Specialist High Skills Major, French as a Second Language and Parent Reaching Out grants could be combined.

With regards to CODE summer learning, if CODE is receiving funds from the Ministry and then passing the funding through to TDSB, the Ministry could consider funding the school boards directly to streamline the process.

REDUCING ADMINISTRATIVE BURDEN AND RED TAPE

1. Are there opportunities to reduce the number of non-financial reports and PPF reports school boards currently submit to the Ministry?

There are significant, non-financial reporting requirements for certain PPFs, such as Human Rights and Equity Advisor (HREA), Autism Spectrum Disorders (ASD), Focus on Youth, Graduation Coach program for Black students and French as a Second Language (FSL). The Ministry could consider reducing the reporting requirements for these PPFs by, for example, requesting only one consolidated year-end report instead of multiple reports with different reporting timelines.

2. Are there areas of overlap or duplication in the current reports school boards submit to the ministry?

There are currently no areas of overlap or duplication in the current reports school boards submit to the Ministry.

SCHOOL BOARD ADMINISTRATION AND GOVERNANCE GRANT

1. Are there areas of overlap between this grant and other grants within the current funding formula to support school board administration and governance? Are there opportunities to streamline funding to eliminate duplication and find savings?

There is no overlap with additional funding provided by the Ministry. While compliance and other requirements for school board administration continues to increase, there is no incremental funding to offset the additional resources required.

2. How can compliance with the enveloping provisions of this grant be consistently measured across school boards?

Data Form D in the Ministry reporting packages provides provisions which can be used to measure compliance.

MANAGING INFORMATION FOR STUDENT ACHIEVEMENT (MISA)

1. How can the ministry better support boards in the annual MISA plan and final reporting template submissions?

The current process ties with the MISA Local Capacity Building (LCB) plan for building system capacity and status reporting. It would be preferred if this can be made available online.

2. Boards currently have discretion to utilize MISA funding in alignment with the 4 priority funding areas (per below) - how relevant are these priority areas for boards moving forward?

As stated in the Education Funding Guide,

MISA funds are used to sustain and advance local capacity to use quality evidence, by targeting funds in at least two of the following four priority funding areas:

> 1. *Build and sustain capacity by continuing work on high priority common core activities to achieve/maintain level(s), as set out in the MISA Common Core Capacities Continuum.*
>
> 2. *Create more collaboration at the classroom, school, board, and/or professional network level(s) in activities related to identifying, analysing, implementing, monitoring, and/or evaluating improvement strategies/initiatives.*
>
> 3. *Promote prioritized availability and usability of information for end-users (e.g. teacher, principal, superintendent), while having regard for privacy protection.*
>
> 4. *Data quality management projects that will improve the timeliness, accuracy and completeness of school board data/information submitted through the Ontario School Information System (OnSIS).*

All of these four priorities are relevant to the TDSB. In addition to these four priority funding areas, TDSB would also like to advocate for priority funding relating to data analytic solutions and systems.

3. Are there other funding priority areas where MISA funds could be directed to maximize impact?

The module "Implementing a Student Management System (SMS)," was included in the Technology section under the old MISA Core Capacities Continuum (March 2015) but was later removed. Most school boards are migrating to a new SIS system, making the module more relevant. As a result of changes, new configuration work and data analytic needs must be done to adapt MISA reporting to the new SIS systems. TDSB is advocating that the module be added back into the MISA Common Capacities Continuum (2018).

CENSUS DATA

1. How should allocations within the GSN be adjusted to reflect updated census data based on the re-distributed impacts to school boards? Should any updates be phased-in? If yes, what is an appropriate phase in period and why?

The allocations should be based on the most recently available census data, as opposed to the 2006 Census, to better reflect the actual demographics of communities and the needs of current students. The redistribution of funds among school boards resulting from using more recent census data should be phased in over two years to allow school boards time to make the necessary adjustments to contract or expand services as required based on the changes in funding levels.

SECONDARY CLASS SIZE COMPLIANCE

1. What are the benefits and/or challenges of implementing a compliance framework for secondary class size?

A compliance framework needs to consider the reasons why a school board may exceed the class size parameters. Financial consequences may adversely impact school boards' ability to access human resources to support historically underserved students and result in further violations of size caps in subsequent years. There are also questions around whether there is any pedagogical rationale for the Ministry's class size caps or if they are based solely on financial considerations.